

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

ENTROPIC COMMUNICATIONS, LLC,

Plaintiff

v.

CHARTER COMMUNICATIONS, INC.,

Defendant.

Civil Action No. 2:22-cv-00125-JRG

**JURY TRIAL DEMANDED**

**CORRECTED JOINT MOTION TO REDACT TRANSCRIPT [DKT. 405]**

**I. INTRODUCTION**

Defendant Charter Communications, Inc. (“Charter”) and Plaintiff Entropic Communications, LLC hereby respectfully request the Court to redact portions of three lines of the December 8, 2023 Pretrial Hearing Transcript (Dkt. 405) (“Transcript”).

**II. LEGAL STANDARD**

“[W]here the parties request redaction of confidential financial and business information discussed at the hearing, the court will grant the motion.” *Personal Audio, LLC, v. Apple, Inc.*, No. 9:09-cv-00111-RC, Dkt. 75 (E.D. Tex. Feb. 22, 2010). “[P]arties may redact only those portions [of a transcript] actually containing (not merely alluding to) non-public information the release of which would cause commercial harm to an entity or person.” *God Kaisha IP Bridge 1 v. Broadcom Ltd.*, No. 2:16-cv-00134-JRG-RSP, Dkt. 291 (E.D. Tex. Apr. 28, 2017).

### III. ARGUMENT

Good cause exists for the redactions as these contain highly confidential and sensitive business information regarding Charter's business decisions. Specifically, the parties seek to redact three portions of the Transcript that contain non-public information—[REDACTED]  
[REDACTED]—the release of which would cause commercial harm to Charter. The parties seek to redact the following:

Page(s):Line(s)	Proposed Redacted Text
9:7	[REDACTED]
9:16	[REDACTED]
10:2	[REDACTED]

Further, because the parties seek to redact three small, discreet portions of the Transcript, the redaction of this material will not impede the understanding of the rulings of the Court. A proposed redacted version of the hearing transcript is attached as Exhibit A.

### IV. CONCLUSION

Accordingly, the parties respectfully request that the Court grant their motion to redact portions of the December 8, 2023 transcript (Dkt. 405).

Dated: December 29, 2023

Respectfully submitted,

/s/ Daniel Reisner by permission Elizabeth Long

Deron R. Dacus  
State Bar No. 00790553  
The Dacus Firm, P.C.  
821 ESE Loop 323, Suite 430  
Tyler, TX 75701  
Phone: (903) 705-1117  
Fax: (903) 581-2543  
Email: ddacus@dacusfirm.com

Daniel L. Reisner  
David Benyacar  
Elizabeth Long  
Albert J. Boardman  
Melissa Brown  
ARNOLD & PORTER KAYE SCHOLER LLP  
250 West 55th Street  
New York, New York, 10019-9710  
Telephone: (212) 836-8000  
Email: daniel.reisner@arnoldporter.com  
Email: david.benyacar@arnoldporter.com  
Email: elizabeth.long@arnoldporter.com  
Email: albert.boardman@arnoldporter.com  
Email: melissa.brown@arnoldporter.com

Marc A. Cohn  
Amy L. DeWitt  
William Louden  
William O. Young  
Thomas Carr  
Natalie Steiert  
ARNOLD & PORTER KAYE SCHOLER LLP  
601 Massachusetts Avenue NW  
Washington, DC 20001-3743  
Telephone: (202) 942-5000  
Email: marc.cohn@arnoldporter.com  
Email: amy.dewitt@arnoldporter.com  
Email: william.young@arnoldporter.com  
Email: thomas.carr@arnoldporter.com  
Email: natalie.steiert@arnoldporter.com

Zachary A. Nemirovsky  
ARNOLD & PORTER KAYE SCHOLER LLP  
3000 El Camino Real #500,  
Palo Alto, California 94304

Telephone: (650) 319-4500  
Email: [zachary.nemirovsky@arnoldporter.com](mailto:zachary.nemirovsky@arnoldporter.com)

*Attorneys for Defendant  
Charter Communications, Inc.*

/s/ Katherine Allor

James Shimota  
Jason Engel  
George Summerfield  
Katherine L. Allor  
Samuel P. Richey  
Ketajh Brown  
K&L GATES LLP  
70 W. Madison Street, Suite 3300  
Chicago, IL 60602  
Tel: (312) 807-4299  
Fax: (312) 827-8000  
[jim.shimota@klgates.com](mailto:jim.shimota@klgates.com)  
[jason.engel@klgates.com](mailto:jason.engel@klgates.com)  
[george.summerfield@klgates.com](mailto:george.summerfield@klgates.com)  
[katy.allor@klgates.com](mailto:katy.allor@klgates.com)  
[samuel.richey@klgates.com](mailto:samuel.richey@klgates.com)  
[ketajh.brown@klgates.com](mailto:ketajh.brown@klgates.com)

Nicholas F. Lenning  
Courtney Neufeld  
K&L GATES LLP  
925 Fourth Avenue, Suite 2900  
Seattle, WA 98104-1158  
Tel: (206) 623-7580  
Fax: (206) 623-7022  
[nicholas.lenning@klgates.com](mailto:nicholas.lenning@klgates.com)  
[courtney.neufeld@klgates.com](mailto:courtney.neufeld@klgates.com)

Darlene Ghavimi  
Matthew A. Blair  
K&L GATES LLP  
2801 Via Fortuna, Suite 650  
Austin, Texas 78746  
Tel: (512) 482-6800  
[darlene.ghavimi@klgates.com](mailto:darlene.ghavimi@klgates.com)  
[matthew.blair@klgates.com](mailto:matthew.blair@klgates.com)

Christina N. Goodrich  
Connor J. Meggs

[REDACTED]

K&L GATES LLP  
10100 Santa Monica Blvd., 8th Floor  
Los Angeles, CA 90067  
Tel: (310) 552-5031  
Fax: (310) 552-5001  
[christina.goodrich@klgates.com](mailto:christina.goodrich@klgates.com)  
[connor.meggs@klgates.com](mailto:connor.meggs@klgates.com)

Peter E. Soskin  
K&L GATES LLP  
Four Embarcadero Center, Suite 1200  
San Francisco, CA 94111  
Tel: (415) 882-8046  
Fax: (415) 882-8220  
[peter.soskin@klgates.com](mailto:peter.soskin@klgates.com)

Alan Littmann  
Michael Pieja  
Doug Winnard  
Jennifer Hartjes  
Shaun Zhang  
GOLDMAN ISMAIL TOMASELLI  
BRENNAN & BAUM, LLP  
200 South Wacker Drive, 22nd Floor  
Chicago, IL 60606  
Tel: (312) 681-6000  
Fax: (312) 881-5191  
[alittmann@goldmanismail.com](mailto:alittmann@goldmanismail.com)  
[mpieja@goldmanismail.com](mailto:mpieja@goldmanismail.com)  
[dwinnard@goldmanismail.com](mailto:dwinnard@goldmanismail.com)  
[jhartjes@goldmanismail.com](mailto:jhartjes@goldmanismail.com)  
[szhang@goldmanismail.com](mailto:szhang@goldmanismail.com)

Wesley Hill  
Texas Bar No. 24032294  
Andrea Fair  
Texas Bar No. 24078488  
Charles Everingham, IV  
Texas Bar No. 787447  
WARD, SMITH & HILL, PLLC  
1507 Bill Owens Pkwy  
Longview, TX 75604  
Tel: (903) 757-6400  
[wh@wsfirm.com](mailto:wh@wsfirm.com)  
[andrea@wsfirm.com](mailto:andrea@wsfirm.com)  
[ce@wsfirm.com](mailto:ce@wsfirm.com)

*Attorneys For Plaintiff  
Entropic Communications, LLC*

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document and all attachments thereto are being filed electronically in compliance with Local Rule CV-5(a). As such, this document is being served December 29, 2023, on all counsel of record, each of whom is deemed to have consented to electronic service. L.R. CV-5(a)(3)(A).

/s/ Elizabeth Long

Elizabeth Long

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies pursuant to Local Rule CV-7(i) that the relief requested in this motion is agreed.

/s/ Elizabeth Long

Elizabeth Long